



IBM Software Group

# Do Not E-mail Registries: Standards, Operational Issues, and Business Models

**Tivoli.** software

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 e-business software

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# Agenda



- Goals
- Technology Neutral Solutions and Open Standards
- Operational Considerations
- Business Model Considerations

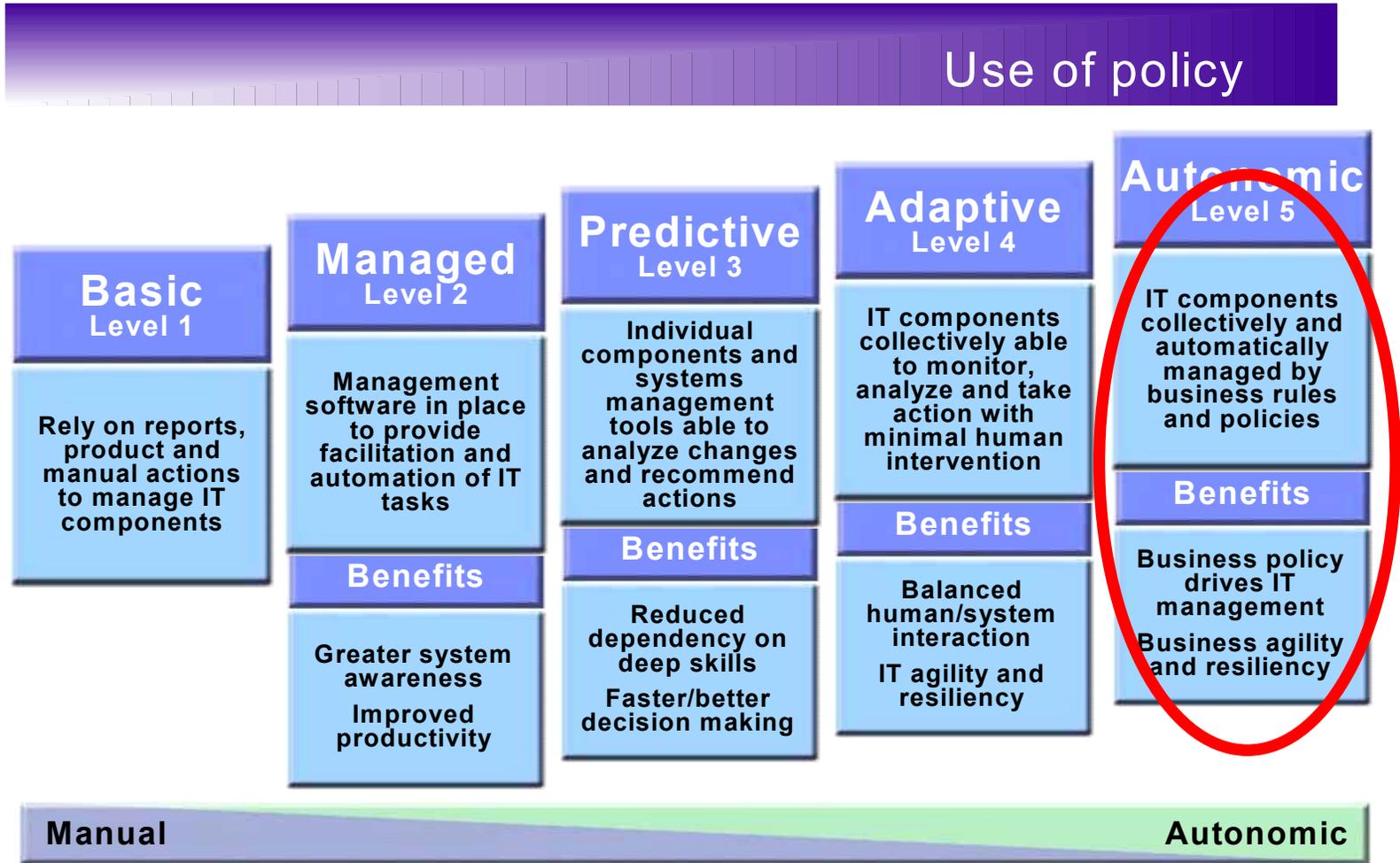
## Some Obvious Goals . . .

- Allow end user to control reception of unsolicited commercial e-mail.
- Do not interfere with B2C relationships that end-user wants
- Keep e-mail protocols open, non-proprietary

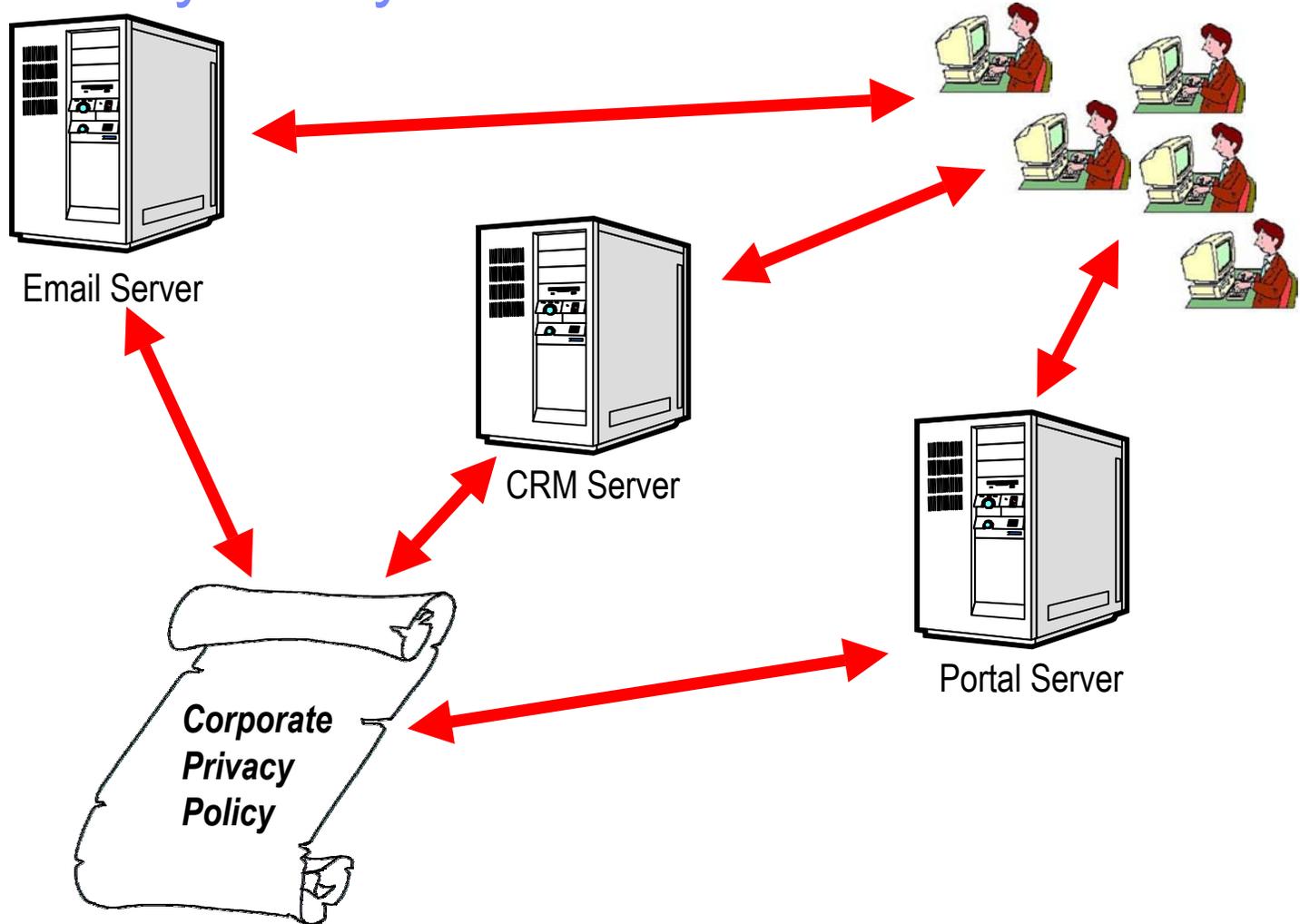
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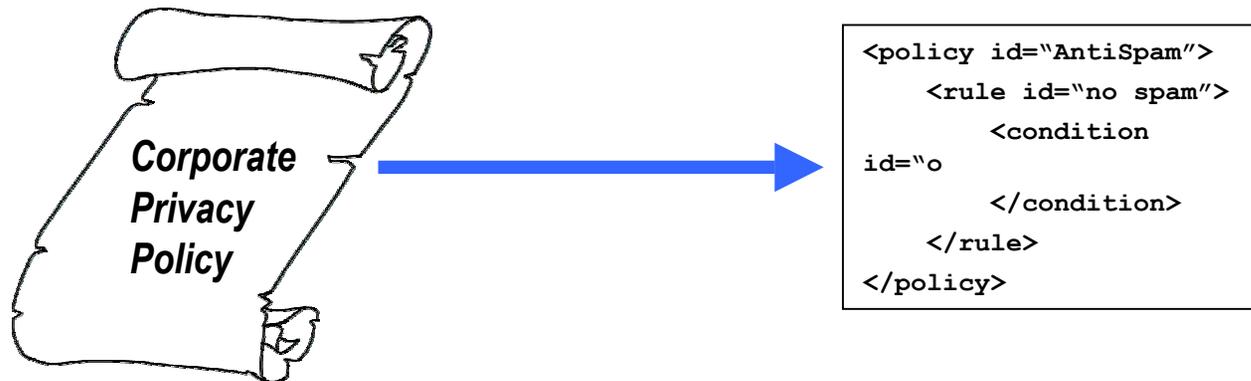
# Business Policy is Key to Autonomic Vision



# Central Privacy Policy



# EPAL Privacy Policy Definition



EPAL Policies are portable, technology neutral representations of the natural language text policy (or law!) being implemented.

## California State Bill 186 – Legislative Counsel’s Digest

“The bill would instead prohibit a person or entity located in California from initiating or advertising in unsolicited commercial e-mail advertisements.

The bill would prohibit a person or entity not located in California from initiating or advertising in unsolicited commercial e-mail advertisements sent to a California e-mail address.

The bill would also prohibit a person or entity from collecting e-mail addresses or registering multiple e-mail addresses for the purpose of initiating or advertising in an unsolicited commercial e-mail advertisement from California or to a California e-mail address.”

## California State Bill 186 – Legislative Counsel’s Digest

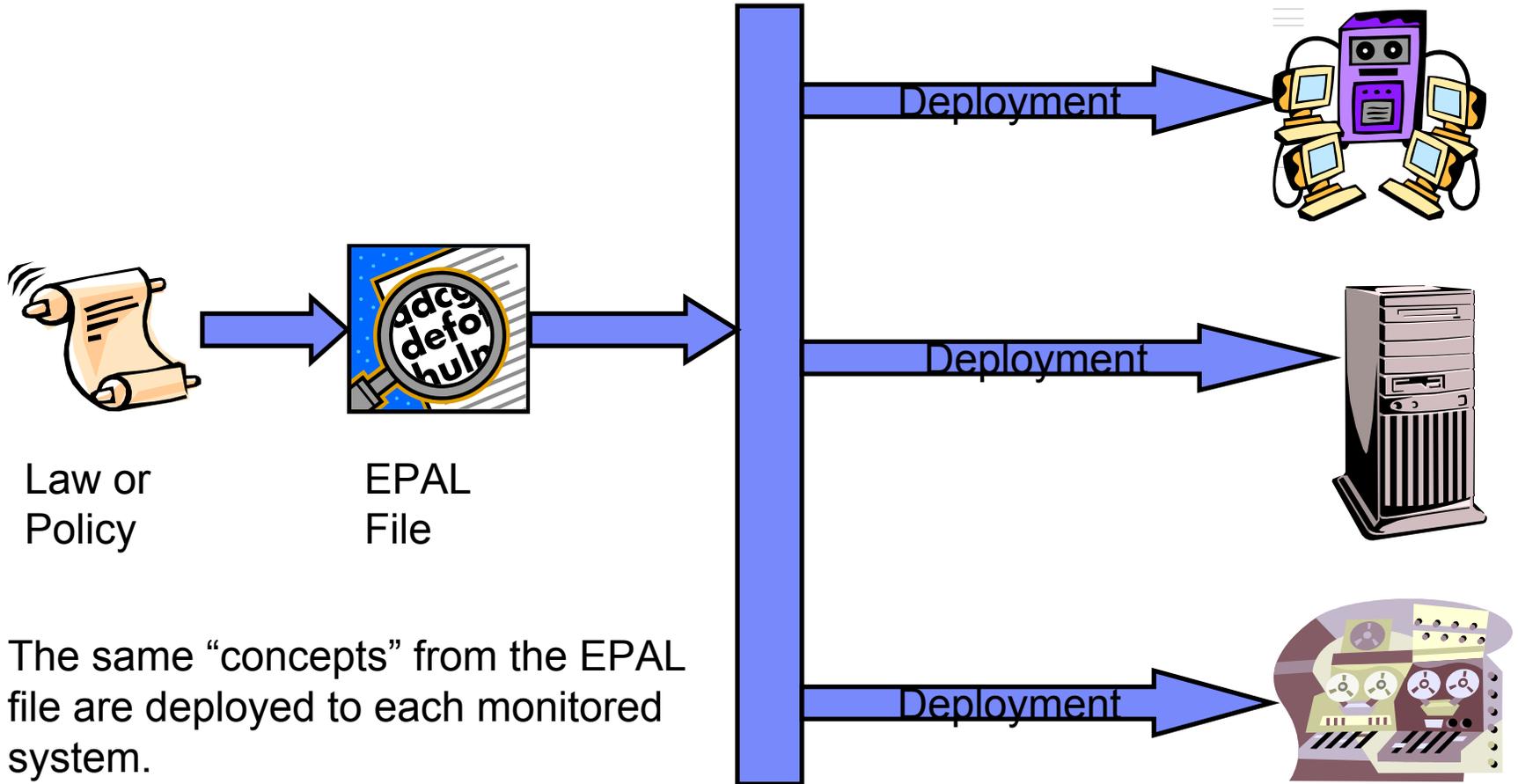
“The bill would instead prohibit a [User-category] [Condition] from [Action]  
[Action] in [Condition] [Purpose] e [Data Category] [Purpose]

The bill would prohibit a [User-category] [Condition] from [Action]  
[Action] in [Condition] [Purpose] e [Data Category] [Purpose] sent to a [Condition]  
[Data Category]

The bill would also prohibit a [User-category] from [Action] [Data Category] or  
registering multiple e [Data Category] for the purpose of [Action] an  
[Condition] [Purpose] [Data Category] [Condition] or [Condition] a  
[Data Category].”

User-category
  Data Category
  Action
  Purpose
  Condition
  Obligation

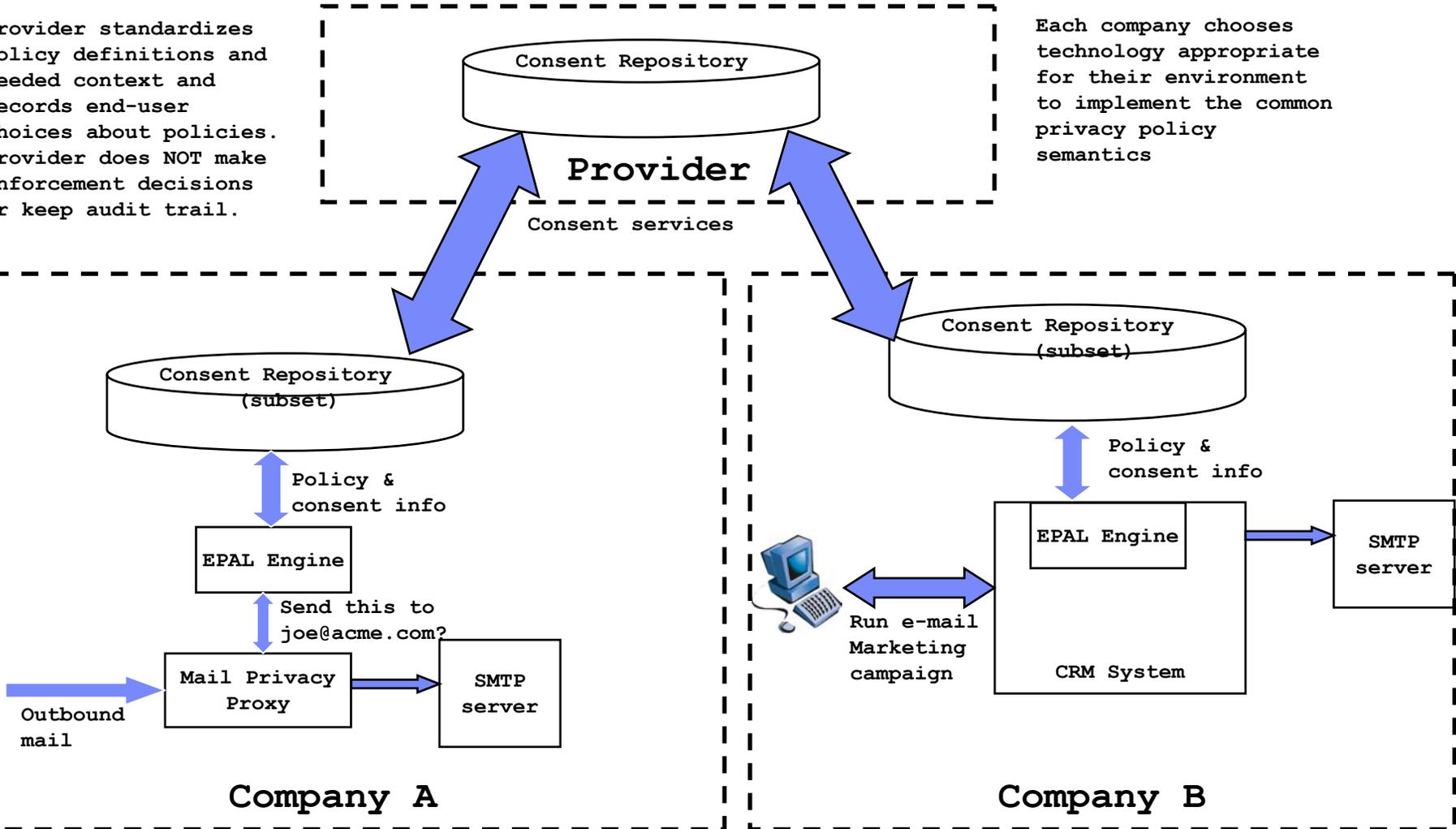
# Consistent Data Handling Practices



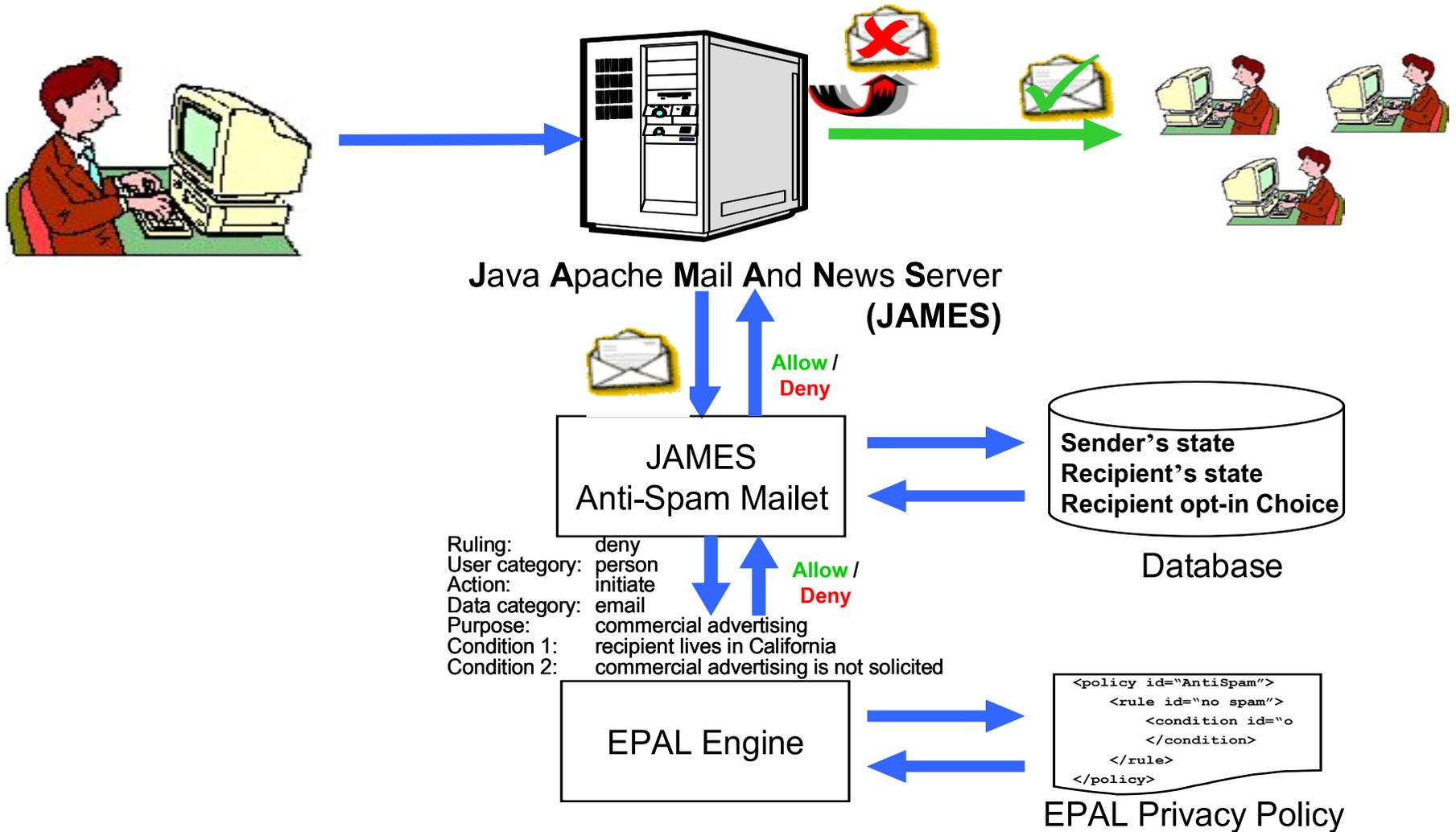
# Standardize Policy and Semantics, Not Technology

Provider standardizes policy definitions and needed context and records end-user choices about policies. Provider does NOT make enforcement decisions or keep audit trail.

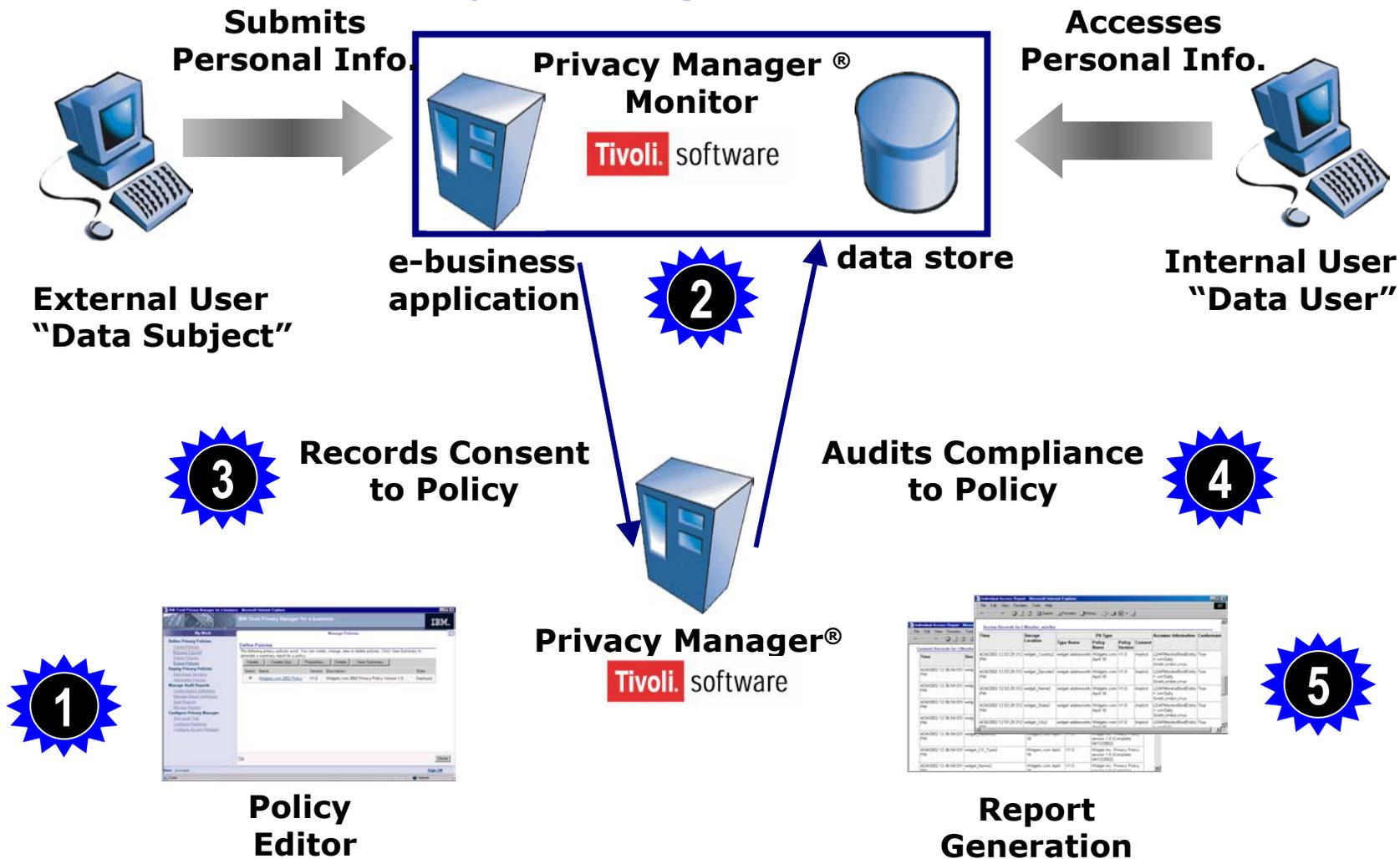
Each company chooses technology appropriate for their environment to implement the common privacy policy semantics



# Anti-Spam Email Privacy Management



# What Does Privacy Manager Do?



# Sample Individual Access Report

Individual Access Report - Microsoft Internet Explorer

File Edit View Favorites Tools Help

## Individual Access Report

### Alice Barfield Individual Access Report - Report Generated at 07/22/2003 15:27:07 (UTC)

Monitors Selected: LDAPMonitor 01/28/2003 22:19:56:062 (UTC)

Absolute Time Interval: From 5/01/03 15:26 (UTC) to 7/22/03 15:26 (UTC)

Conformance: All Access Records

LDAPMonitorFullyQualifiedDN on LDAPMonitor: cn=alice barfield,ou=customer,o=widgets.com

### Consent Records for LDAPMonitor at Registration Date 01/28/2003 22:19:56:062 (UTC)

Date of Consent	Storage Location	Privacy Policy	
		Name	Version
<a href="#">05/8/2003 15:03:26:703 (UTC)</a>	name	Sales	1.0
<a href="#">05/8/2003 15:03:26:704 (UTC)</a>	address	Sales	1.0
<a href="#">05/8/2003 15:03:26:705 (UTC)</a>	homePhone	Sales	1.0

### Access Records for LDAPMonitor at Registration Date 01/28/2003 22:19:56:062 (UTC)

Date of Disclosure	Storage Location	PII Recipient	Purpose of Disclosure	Conformant
<a href="#">06/12/2003 09:15:34:273 (UTC)</a>	name	MSTATLER	contact	True
<a href="#">06/12/2003 09:15:34:274 (UTC)</a>	address	MSTATLER	contact	True
<a href="#">06/12/2003 09:15:34:275 (UTC)</a>	homePhone	MSTATLER	contact	True
<a href="#">07/18/2003 15:05:49:344 (UTC)</a>	name	LPHILLIPS	contact	True
<a href="#">07/18/2003 15:05:49:346 (UTC)</a>	address	LPHILLIPS	contact	True
<a href="#">07/18/2003 15:05:49:347 (UTC)</a>	homePhone	LPHILLIPS	contact	True

## Machine Enforceable Policies Must:

- Represent policies, not configuration
- Support both broad and detailed statements of data handling practices
- Support complex, context driven decisions
  - Especially based on business purpose and data subject consent
- Be reusable and portable
- Support externally defined vocabularies
  - From sector specific sources and legislative sources
- Support policy negotiation

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## Origin of IBM's E-Mail Suppression System

One of the ways we measure success in Marketing is by the longevity of our customer interaction and customer loyalty. We have the responsibility as Marketers to protect and safeguard the wishes of our customers and prospects.

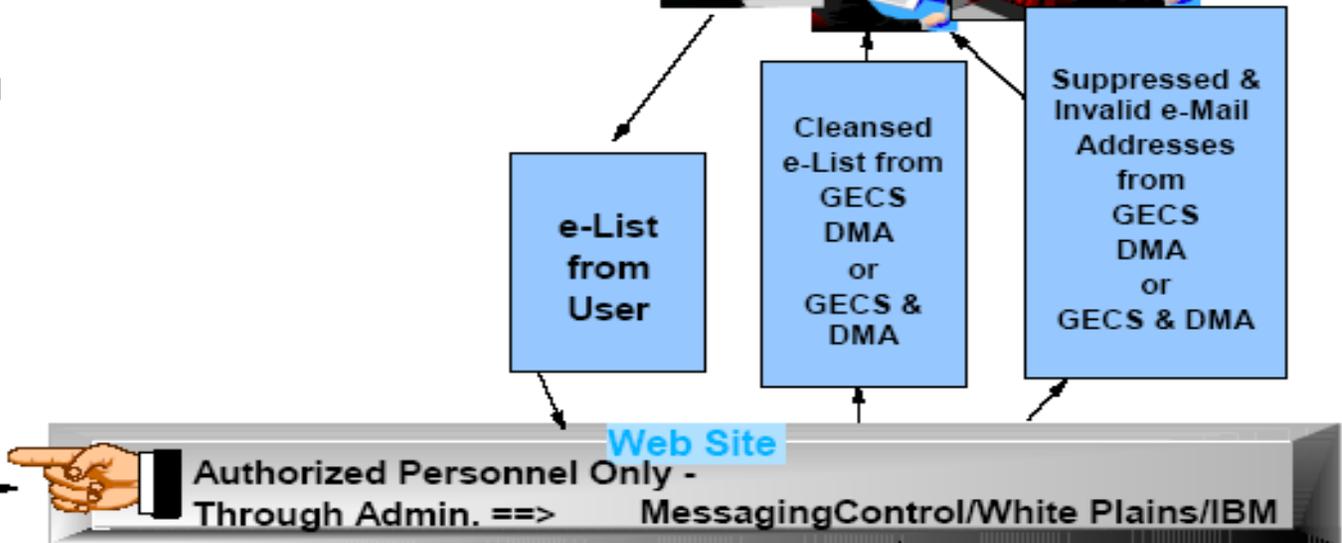
If a customer says, "No, I don't want to receive e-mail, but I do want to have a Rep contact me" or "I'll take marketing but I don't want to have e-mail", we must respect their wishes.

In May 2000 IBM adopted the privacy standard to suppress sending e-mail to individuals that have expressly requested not to receive e-mail from IBM.

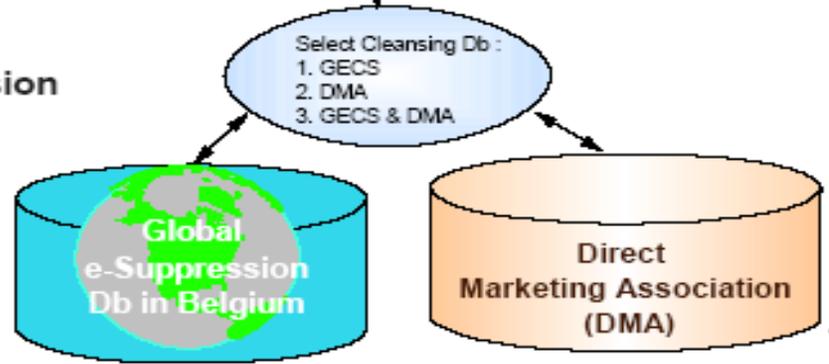
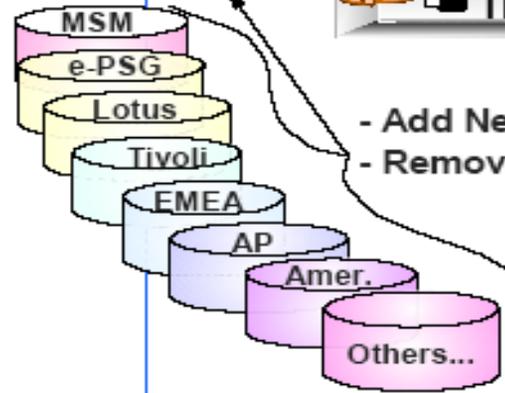
The Global E-Mail Cleansing Service is IBM's infrastructure for enforcing this privacy standard.

Customer Information  
Focusing on Customers

# What is GECS?



- Add New Suppressions
- Remove From Suppression



## GECS Characteristics

- GECS receives feeds from all major databases, containing e-mail data, across IBM worldwide.
- IBM Marketers use GECS to screen individual campaigns just prior to sending.
- Third party list providers and business partners may use GECS as a trusted screener to ensure that customers requesting opt-out have that request honored even on third party lists.

# Database Issues

- Scalability Challenges
- Current as well as Historical Records must be kept
  - E-mail address
  - Identification number
  - Date/time Received First
  - Date/time Verification note sent
  - Date/time Validated (verification note received)
  - Control Value (NO SPAM/UNRESTRICTED)
  - Date Changed:
  - Date Change Validation sent
  - Date Change Validation received

# Channels

- Consumer Interfaces
  - Web, Postal Mail, Phone
- Validation Strategy
  - All channels need a protocol for verifying and validating enrollment and changes.

# Audit

- Inevitably someone is going to complain about how the DB does its job...or they are going to contend that the application didn't properly screen records and folks on the DB got mail they shouldn't have received.
- The ability to retain processing sets for a defined period of time is critical.
- Maintenance of an audit trail of interactions by an individual must be planned for up front so the administrators can identify when a change was made and whether or not that change should have been reflected in the screening instance.



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# Who and How access to DB

- Who Can Access the DB?
  - Administrators
  - Companies that need to screen campaigns
  - Service Bureaus
    - That are properly licensed, bonded, etc.
  - Foreign Companies?
- How?
  - Never online publicly
  - Other automated mechanisms?

# End User Policies

- Who's eligible to be on the list?
- How do folks get on/off the list?
  - Individual enrollment only?
  - Can a third party enroll/de-enroll you?
- How often should enrollment verification be done?
- How long is the address kept on file after enrollment expires?

# Decoy Monitoring

- Public Decoys
  - Raises red-flags of abuse
- Unique-Per Copy Decoys
  - To help identify abuser
- There are established protocols for managing these issues for other technologies that would be appropriate for use here. And service companies that make their living managing things like this.

## Validation and removal/archiving

- E-mail confirmations to validate being on list both for enroll and changes
- How long should addresses be kept after no more validations

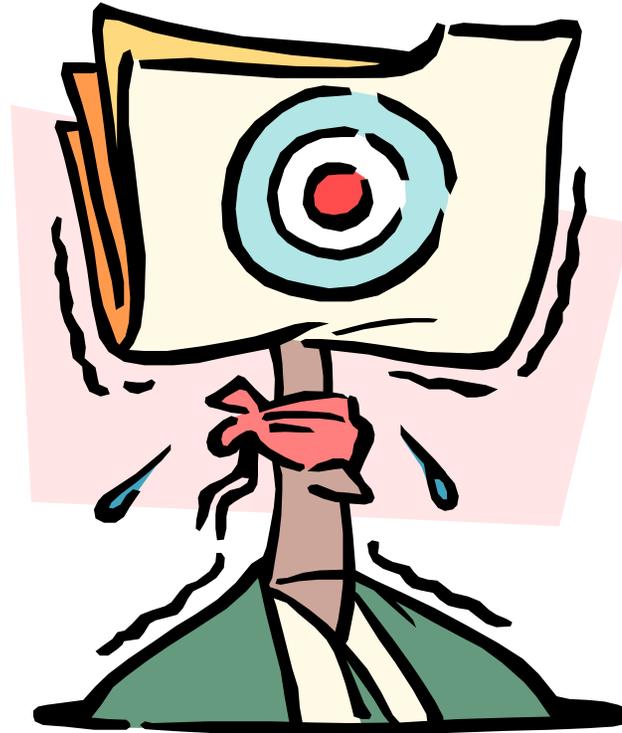
# Payment Models

- **Subscription Model**  
For marketers and service bureaus that license copies of the data base.
- **Per usage Model**  
For companies that do their own screening

## Possible Secondary By-Products

- Valid users of system could be fed into white-list systems
  - Would you charge for it?
- “Seal” / Honor Roll Opportunity?

# Questions?



## Contact:

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